



EDWARDS
POTTINGER LLC

Florida Office

Bradley J. Edwards *†
Seth M. Lehrman *†
Brittany N. Henderson *◇
Matthew D. Weissing *†

425 North Andrews Avenue
Suite 2
Fort Lauderdale, FL 33301

Telephone (954) 524-2820
Fax (954) 524-2822

New York Office

J. Stanley Pottinger ‡

† Admitted in California
◇ Admitted in District of Columbia
* Admitted in Florida
‡ Admitted in New York
‡ Board Certified Civil Trial Lawyer

October 3, 2018

Via ECF

Hon. Stewart D. Aaron, United States Magistrate Judge
United States Courthouse
Southern District of New York
500 Pearl St.
New York, New York 10007-1312

Re: CMG Holdings Group, Inc. v. Joseph Wagner, et al.
15-cv-05814-JPO

Dear Judge Aaron:

This is a letter motion to file undersigned counsel's Letter Motion to Withdraw under seal pursuant to Section 6.2 of the Electronic Case Filing Rules & Instructions for the Southern District of New York. Counsel's Letter Motion to Withdraw contains confidential information, consisting of privileged attorney-client communications which have not waived. *See Lugosch v. Pyramid Co. of Onondaga*, 435 F.3d 110, 125 (2d Cir. 2006)(finding that privileged attorney-client matters, which have not been waived, defeats the presumption of access under the First Amendment and maybe properly filed under seal). Accordingly, counsel seeks leave to file the motion under seal.

Very truly yours,

Seth Lehrman

Seth Lehrman

cc: Scott Matthews, Esq. (Via ECF)
CMG Holdings Group, Inc., c/o Glenn Laken via email
Glenn Laken via email
Alexis Laken via email
David Stone, Esq. (Via ECF)
Julio C. Gomez, Esq. (Via ECF)